

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

EMBLEMHEALTH, INC., individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

ALEXION PHARMACEUTICALS, INC. and  
ALEXION PHARMA INTERNATIONAL  
OPERATIONS LTD.

Defendants.

Case No. 1:25-cv-10985-BEM

**DEFENDANTS' MOTION TO DISMISS THE AMENDED COMPLAINT**

Defendants Alexion Pharmaceuticals, Inc. and Alexion Pharma International Operations Ltd. (collectively, "Alexion") move to dismiss the Amended Complaint for failure to state a claim pursuant to Federal Rule of Civil Procedure 12(b)(6). For all the reasons set forth in the accompanying Memorandum of Law, Alexion respectfully requests that the Court enter an order dismissing all claims in the Amended Complaint with prejudice, and grant such other and further relief as is just and proper.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Rule 7.1(d) of the Local Rules of the United States District Court for the District of Massachusetts, Alexion respectfully requests to be heard at oral argument on this Motion.

Dated: August 5, 2025

/s/ Kenneth S. Leonetti  
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*Pharma International Operations Ltd.*

**LOCAL RULE 7.1 CERTIFICATION**

I hereby certify that on August 5, 2025, counsel for Alexion conferred with Plaintiff's counsel via email in an effort to narrow or resolve the issues presented in this Motion. Plaintiff did not assent to the relief requested herein.

/s/ Kenneth S. Leonetti

Kenneth S. Leonetti

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this document has been electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

/s/ Kenneth S. Leonetti

Kenneth S. Leonetti